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April 26, 2002

VIA FACSIMILE AND U.S. MAIL

Mr. Richard R. Long, Director
Air and Radiation Program
EPA Region 8
Mailcode 8P-AR
999 18th Street
Suite 300
Denver, CO 80202
Fax No. 303-312-6064

Re: Preliminary Response of Great River Energy to Request for Comments on EPA's
Draft SO₂ Modeling for North Dakota

Dear Mr. Long:

This letter responds to your request, dated March 5, 2002 for comments on EPA's draft dispersion modeling analysis of PSD increment consumption in North Dakota and eastern Montana. On March 20 and again on April 4, Great River Energy ("GRE") requested underlying information referenced in and used by EPA in preparing its draft analysis. By letter dated April 3, 2002 you extended the time to provide comments regarding EPA's draft modeling until April 29, 2002. Much of the basic information requested by GRE was not received until April 18. By letter dated April 18, 2002, GRE requested an extension to respond to EPA's analysis until May 15, 2002 or the close of the state proceedings on the increment matter. In that letter, GRE explained the reasons why additional time is necessary to adequately assess and provide substantive comments on EPA's draft modeling. As of the date of this letter, EPA has not responded to GRE's

written request for an extension until May 15, or the close of the comment period for the state increment proceeding.

EPA indicates in its request for comments that it is seeking input on "all aspects of the modeling analysis" and that it is "particularly interested in technical comments" including those regarding EPA's characterization of baseline and current emissions and "whether the inputs and settings in the Calpuff model have been selected in a manner that is technically sound and suitable for regulatory purposes." Unfortunately, EPA has not allotted sufficient time to obtain such comments. There simply is insufficient time to adequately review Calmet fields and Calpuff predictions and run sensitivity analyses to assess whether the models, and selected inputs and settings, are providing reasonable predictions for individual events. Similarly, there is not sufficient time to conduct a thorough review of current and baseline emissions estimates relied upon by EPA in its draft modeling.

Given the highly technical workings of the models and the immense and various data needed to effectively assess model performance, it is not possible to provide complete or meaningful comments on EPA's draft modeling in the time frame requested. This is particularly true when considering that GRE did not receive from EPA much of the basic information needed to begin review and comment on EPA's draft modeling until April 18—11 days before comments were requested to be submitted by EPA. Further, other key information, such as the 2000 modeling files, which are necessary to assess model performance and EPA predictions, were not provided to GRE. Limitations regarding the ability to review relevant data and conduct necessary assessments are exacerbated by the fact that GRE, and other North Dakota utilities, are also in the process of reviewing North Dakota's modeling analysis and underlying data, and are preparing to participate in the North Dakota hearing on the increment issue that is scheduled to start in less than two weeks.

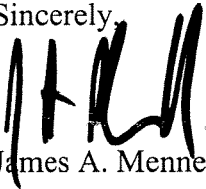
EPA's draft modeling analysis is specifically identified as within the scope of the North Dakota increment hearing, and it is our understanding that EPA plans to actively participate in that proceeding. GRE will present testimony as part of the increment proceeding and plans, by the close of the hearing record, to provide as many germane comments on the North Dakota increment consumption issue as are possible given time and information constraints. This will include testimony and comments regarding EPA's draft modeling. We look forward to sharing with EPA GRE's comments and experts' analysis regarding the increment issue, as well as GRE's comments regarding EPA's draft modeling. We will provide to you, by May 15, or the end of the state of North Dakota's comment period for the increment proceeding, a copy of all testimony, legal memoranda and technical expert evaluations or reports concerning North Dakota modeling that are submitted to the North Dakota Department of Health as part of the increment proceeding. We believe our comments will be helpful to EPA in evaluating the North Dakota increment issue.

This preliminary response letter, in lieu of a more substantial critique of EPA's draft modeling, does not reflect GRE's lack of interest in commenting on EPA's draft

modeling and should not be construed to mean that we do not believe that there are severe legal and technical problems with EPA's draft modeling. In fact, GRE is very concerned by EPA's draft modeling. Further, GRE believes that all relevant and valid information indicates that SO₂ concentrations in North Dakota's Class I areas have decreased and that North Dakota's State Implementation Plan is adequate to prevent significant deterioration. This letter is necessary, however, because of the impossibility of adequately responding to EPA's draft analysis in the time frame suggested, and because of EPA's failure to respond to GRE's request for additional time to provide pertinent comments.

Please call me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. A. Mennell', written over the printed name.

James A. Mennell

c. Mary Jo Roth